

Exhibit 31

1 UNITED STATES DISTRICT COURT

2 EASTERN DISTRICT OF NEW YORK

3 Action No: 05cv4622(DGT)(MDG)

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5 TZVI WEISS, et al.,
6 Plaintiffs,
against

7 NATIONAL WESTMINSTER BANK, PLC.,
8 Defendant.

9 NATAN APPLEBAUM, et al.,
10 Plaintiffs,
against

12 NATIONAL WESTMINSTER BANK, PLC.,
13 Defendant.

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16 VIDEOTAPED DEPOSITION OF AMANDA HOLT

17 Friday 23 July 2010

18 At: 10:00 am

19 Taken at:

20 Cleary, Gottlieb, Steen & Hamilton LLP
21 55 Basinghall Street, London
United Kingdom

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1 Gossage, the Head of Group Risk. I genuinely cannot
2 remember exactly when, but in 2002.

3 Q. And did Mr. Swanney pass over with that
4 function?

5 A. No, he didn't. The function passed over
6 but David Swanney I think left the bank at the time.

7 Q. Okay, and whenever that function arrived
8 in -- did it arrive in Group Enterprise Risk?

9 A. No, it arrived in Group Risk.

10 Q. So that was not under your -- that was not
11 part of your remit?

12 A. Group Compliance was split, I was given
13 responsibility for ensuring that the Know Your Customer
14 requirements were being met, and then subsequently the
15 responsibility for Money Laundering Prevention and
16 Sanctions in Terrorist Financing was formally passed
17 over to Enterprise Risk later on in 2002. The rest of
18 Compliance, which was renamed Group Regulatory Risk, was
19 passed over to be under Richard Gossage, and there was
20 a new Head of Regulatory Risk recruited.

21 Q. Do you recall who that was?

22 A. Stephen Sanders.

23 Q. When you started at RBS, in early 2002,
24 was Stephen Foster one of the people who reported to
25 you?

1 A. No, he was not.

2 Q. Did you hire him at some point?

3 A. I hired him, yes.

4 Q. Do you recall when that was?

5 A. Again, that was in 2002. It was when

6 I acquired responsibility for Money Laundering

7 Prevention and Sanctions in Terrorist Financing.

8 Q. And what were Mr. Foster's duties and

9 responsibilities?

10 A. I don't recall the detail. There would
11 have been a detailed job spec, but his title was Head of
12 Group Anti-money Laundering.

13 Q. And do you recall anybody else who
14 reported to you in or around late 2002, in Group
15 Enterprise Risk?

16 A. Just for clarity, is that with
17 responsibility for Anti-money Laundering and Financial
18 Crime or across the board?

19 Q. Let start just with responsibility for
20 Anti-money Laundering and Financial Crime?

21 A. Stephen Foster had responsibility for
22 Anti-money Laundering and Financial Crime. There was
23 a separate project going on I think. Towards the end of
24 2002 and 2003, the Joint Money Laundering Steering
25 Group, which is a regulatory body which has members